IN THE ABSTRACT

Cancel the present Abstract and substitute the new Abstract which is submitted on separately numbered page 29.

REMARKS

In the Office Action dated August 28, 2002, a set of Formal Drawings was required, wherein the informalities indicated on Form PTO-948, attached to the Office Action, are corrected. Such a revised set of formal drawings is submitted herewith under separate cover.

Claim 1 was objected to because of an informality therein, which has been corrected.

The Examiner stated that the Information Disclosure Statement filed on June 14, 2000 did not comply with 37 C.F.R. §1.98(a)(3) because it did not include a concise explanation of the relevance of each item that was listed therein that is not in the English language. The Examiner stated "It has been placed in the application file but the information referred to there has not been considered." Applicants assume that this was an over-generalization, since the Examiner has initialed Form 1449 which accompanied the June 14, 2000 Information Disclosure Statement, as to the references in the English language. Applicants assume that the Information Disclosure Statement has, in fact, been considered, but only the two references cited therein which are not in the English language have been placed in the file but not considered.

A number of informalities in the specification were noted, all of which have been corrected. Applicants note that the correction made at page 6 conforms the language at that location to the language describing Figure 1b, for example, at the

-4-

top of page 5, and therefore no new matter is added thereby. The other changes in the specification are believed to be self-explanatory.

Claims 1 and 9-11 were rejected under 35 U.S.C. §103(a) as being unpatentable over Windel et al '463 and Gilham, in view of Guenther. This rejection is respectfully traversed for the following reasons.

As explained at numerous locations in the present specification, including the aforementioned amended paragraph at page 6, beginning at line 4, the important feature of the method and apparatus disclosed and claimed in the present application is the division of tasks between two data processing units, namely a security module for processing security tasks, and a microprocessor for processing printing tasks. As explained in that paragraph, this division of tasking (processing) results in a processing time duration per franking with a security imprint that is shorter then the processing time duration per franking which was achievable by conventional methods and systems, which did not employ such a processing division.

This advantage is also summarized in the first full paragraph on page 3 of the present specification, beginning at line 6.

In the substantiation in the Office Action of the aforementioned rejection, the Examiner acknowledged that neither Windel et al '463 nor Gilham explicitly discusses the separate data processing for the franking imprint at the printing module. The Examiner stated it would have been an obvious matter of design choice to modify the teachings of Windel et al '463 and Gilham to provide separate data processing externally of the security module, because the Examiner stated that the Applicants have "not disclosed that additional data processing solves any stated problem in a new or unexpected way or is for any particular purpose which is

unobvious to one of ordinary skill in the art ...". Applicants are unable to understand how the Examiner can make such a statement in view of the aforementioned explanations in the specification as to the significant advantages achieved by such separate data processing for security purposes and for printing purposes.

Windel et al '463 discloses a method and an arrangement for generating and checking a security imprint. The arrangement for generating the security imprint shown in Figure 1 of the Windel et al '463 reference does not disclose a security module with a data processing unit separate therefrom. The Gilham reference teaches a franking system having numerous embodiments, but none of those embodiments disclose a separate security module and a separate data processing unit.

The Examiner relied on the Guenther reference as teaching a "secondary" data processing unit external to the security module, the Examiner referring to a smart card as such a "secondary" data processing unit. While this is correct, the tasks of compiling a printing image and generating a security code in the Guenther reference clearly take place without any relationship to each other. It is not even necessary to rely on the teaching of a smart card in the Guenther reference for this purpose, since such separate printing processing takes place in the printer control 16 and all security-related processing takes place in the postal security module 86 in the Guenther reference. Independent claims 1 and 9 of the present application, however, require that the tasks relating to printing and the tasks relating to generating the security code, even though taking place in separate units, are interleaved. It is this interleaving which achieves the aforementioned time savings.

Since at least in the Windel et al reference, such processing of printing tasks and security-related tasks takes place fundamentally in the same manner as in

Guenther, modifying the Windel et al reference in accordance with the teachings of Guenther would result in virtually no changes at all to the operation of the Windel et al system, at least one the basis of how and where these different types of processing take place.

In view of the complete absence in any of these references to divide and then, to a certain extent, interleave these different processing tasks in any of the references cited by the Examiner, Applicants respectfully submit that there is no motivation to modify those references, in any combination, to arrive at an arrangement as set forth in independent claim 1 or a method as forth in independent claim 9. Applicants therefore submit that the subject matter of claims 1 and 9-11 would not have been obvious to a person of ordinary skill in the art under the provisions of 35 U.S.C. §103(a) based on the teachings of these references.
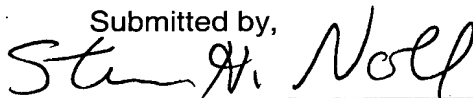
Claims 2-5 and 12-13 were rejected under 35 U.S.C. §103(a) as being unpatentable over the aforementioned combination, further in view of Eckert. Claim 5 was rejected based on this combination, further in view of Windel et al '146. Claims 7 and 8 were rejected over this last-mentioned combination, further in view of Cordery.

All of these rejections are traversed for the same reasons discussed above in connection with the rejection of claims 1 and 9-11. The Examiner has merely added further references to a combination which the Examiner already has acknowledged does not explicitly teach the organization of the processing tasks as set forth in claims 1 and 9. Moreover, although Applicants acknowledge that there is no limit t the number references which can be combined to allegedly substantiate a rejection under Section 103(a), their comes a point when so many references are combined that this is evidence of invention, rather than evidence of non-obviousness. It is

clear that the Examiner has merely combed the art with the claims as a roadmap in an effort to locate each detail of the claimed subject matter. A person of ordinary skill in the art who has not had the benefit of first reading the present disclosure has no such guidance to instruct him or her through the large number of patents in this technology, and Applicants respectfully submit it is unrealistic to assume that such a person of ordinary skill in the art would be able to locate the "right" patents as the Examiner has done without first having had the benefit of reading Applicants' disclosure.

All claims of the application are therefore submitted to be in condition for allowance, and early reconsideration of the application is respectfully requested.

Submitted by,

_____ (Reg. 28,982)

SCHIFF, HARDIN & WAITE
CUSTOMER NO. 26574
Patent Department
6600 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606
Telephone: 312/258-5790
Attorneys for Applicants.

VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE SPECIFICATION:

The paragraph beginning at page 6, line 4 has been amended as follows:

The inventive time/control diagram (shown in Figure 1b) for a postage meter machine requires a data processing time duration T_{new} per franking with a security imprint that is shorter than the old data processing time duration T_{old} per franking. This is possible only because a division of tasks for two data processing units occurs in the invention, whereby a microprocessor is provided in the meter for the printing tasks and a security module is provided for the security tasks.

The paragraph beginning at page 7, line 7 has been amended as follows:

Inventively, the microprocessor stills works on formatting the print image (step 404) or is occupied with the implementation of the print routine (step 405) while the report 412 of a further letter pending ensues to the security module [SM], whereupon the latter already implements further calculations 316-321 for a next piece of mail (letter).

The paragraph beginning at page 7, line 11 has been amended as follows:

As soon as the microprocessor is finished with the implementation of the print routine (step 405), a request is made to the security module to implement an accounting. The security module [SM] now implements the accounting (steps 322, 323) and sends (step 324) the security code DAC to the microprocessor 91 of the meter, which is now in a position to complete the formatting of the print image for the further print image (step 414).

The paragraph beginning at page 8, line 1 has been amended as follows:

The main memory RAM 93 serves for the volatile intermediate storage of intermediate results. The non-volatile memory NVM 94 serves for the non-volatile intermediate storage of data, for example statistical data that are classified according to cost centers. The calendar/clock module 95 likewise contains addressable but non-volatile memory areas for the non-volatile intermediate storage of intermediate results or the storage of known program parts. The control unit 1 is connected to a chip card write/read unit 70, and the microprocessor 91 of the control unit 1 is programmed, for example, for loading the payload data N from the memory area of a chip card for application in corresponding memory areas of the postage meter machine. A first chip card 49 (see Fig. 3) inserted into an insertion slot 72 of the chip card write/read unit 49 allows loading of a dataset into the postage meter machine for at least one application. For example, the chip card 49 contains the postage fees for all standard mail carrier services according to the rate schedule of the postal authority and a mail carrier identifier in order to generate a stamp image with the postage meter machine and frank the pieces of mail in conformity with the rate schedule of the postal authority.

IN THE CLAIMS

Claim 1 has been amended as follows:

1.   (Amended) An [invention] arrangement for generating a security imprint comprising:

a security module containing a first program memory in which a first program is stored and a security module data processing unit connected to said first program memory and being programmed by said first program to calculate a multi-byte security code from existing system data and to

be able to receive new system data to modify said existing system data;

a separate data processing unit disposed externally of said security module and having a second program memory in which a second program is stored, said separate data processing unit being programmed by said second program to edit print data to compile a print image that contains said security code as a security imprint and that embodies a monetary value for franking a mail item; and

said security module data processing unit being further programmed by said first program to, immediately upon receipt of said new system data, validate said new system data and determine whether said new system data are required for said security code and, if so, to immediately begin recalculating said security code in a first routine and, in a second routine, to finish recalculating said security code for at least one security imprint, thereby producing a recalculated security code, and to initiate an accounting operation for said monetary value and to communicate the recalculated security code to said separate data processing unit.